

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

WINFORD DALLAS JONES,	:	
	:	
Plaintiff	:	
	:	
v.	:	
	:	Case No. 7:06-cv-00547
	:	
C. H. ROBINSON WORLDWIDE, INC., <i>et al.</i> ,	:	
	:	
Defendants/Third Party Plaintiffs	:	
	:	
v.	:	
	:	
AKJ ENTERPRISES, INC., d/b/a	:	
Unlimited Express	:	
	:	
and	:	
	:	
ELSON BOLAR	:	
	:	
and	:	
	:	
DIONNIE BOLAR,	:	
	:	
Third Party Defendants.	:	
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PLAINTIFF'S DISCLOSURE OF WITNESSES AND EXHIBITS

COMES NOW Plaintiff, Dallas Jones, by counsel, pursuant to the Court's Scheduling Order, and discloses the following witnesses and exhibits to be presented at trial.

WITNESSES

1. **Winford Dallas Jones** (may use)
4545 Hurston Road
Pulaski, Virginia
540/818-2900
2. **Rick Peele** (may use)
6 Wallingford Road
Greenville, South Carolina 29609
864/616-4732.
3. **Susan Cannedy** (may use)
300 Harvey Street
Radford, Virginia 24141
540/639-9140
4. **Senior Virginia State Trooper K. S. Clark** (may use)
Department of State Police
Wytheville Division
P. O. Box 537
Wytheville, Virginia 24382
276/228-3131
5. **Mike Atkinson**
(adverse witness to be examined as if on cross-examination)
C. H. Robinson
1840 North Marcey Street
Chicago, Illinois

Mr. Atkinson's testimony will be presented in the form of his Rule 30(b)(6) deposition taken on October 8, 2007, and March 6, 2008; however, Plaintiff reserves the right to call this witness for live testimony.

6. **Bruce Johnson**
(adverse witness to be examined as if on cross-examination)
C. H. Robinson
14800 Charleson Road
Eden Prairie, Minnesota

Mr. Johnson's testimony will be presented in the form of his Rule 30(b)(6) deposition taken on October 8, 2007, and March 13, 2008; however, Plaintiff reserves the right to call this witness for live testimony.

7. **Mike Lakotish**

(adverse witness to be examined as if on cross-examination)

C. H. Robinson
8100 Mitchell Road
Eden Prairie, Minnesota

Mr. Lakotish's testimony will be presented in the form of his Rule 30(b)(6) deposition taken on March 13, 2008.

8. **Max Cortis**

(adverse witness to be examined as if on cross-examination)

C. H. Robinson
1840 North Marcey Street
Chicago, Illinois

Subject to his availability at trial, Mr. Cortis's testimony will be presented in the form of his deposition taken on March 7, 2008.

9. **Deb Herd**

(adverse witness to be examined as if on cross-examination)

C. H. Robinson
14800 Charleson Road
Eden Prairie, Minnesota

Subject to her availability at trial, Ms. Herd's testimony will be presented in the form of her deposition taken on March 14, 2008.

10. **Keith Obiala**

(adverse witness to be examined as if on cross-examination)

C. H. Robinson
1840 North Marcey Street
Chicago, Illinois

Subject to his availability at trial, Mr. Obiala's testimony will be presented in the form of his deposition taken on March 7, 2008.

11. **Dr. Thomas Corsi, Ph.D.**

Robert H. Smith School of Business
3321 Van Munching Hall

University of Maryland
College Park, MD 20742-1815

12. **Annette M. Sandberg, Esq.**
(adverse witness to be examined as if on cross-examination)
3101 N. Hampton Drive, #701
Alexandria, VA 22302

EXHIBITS

Plaintiff discloses the following exhibits that will be used or may be used at trial:

1. Virginia State Police Division Four Crash Team Report, dated October 7, 2004 (may offer)
2. Carrier Load Confirmation Sheets, Bills of Lading, and/or Invoices for Loads 21422065; 21013521; 21030917; 21312279; 21066309; 21090599; 16687219; 13340392; 20804793; 20621595; 12114698; 20422186; 20388878; 8706442; 18890743; 20652169; 19289049; 13967722; 20355694; and 20433146.
3. Contract Carrier Agreement between Defendant and AKJ Enterprises, Inc. (dba "Unlimited Express"), dated April 19, 2001
4. Carrier Information Survey for AKJ Enterprises, Inc. dba Unlimited Express
5. Certificate of Federal Operating Authority for AKJ Enterprises, Inc.
6. Certificates of Insurance for AKJ Enterprises, Inc.
7. Automobile Loss Notice, dated September 14, 2004.
8. MCMIS Data regarding AKJ Enterprises, Inc. from records of the Federal Motor Carrier Safety Administration
9. Roadside inspection data concerning AKJ Enterprises, Inc. from the records of the Federal Motor Carrier Safety Administration

10. FMCSA Insurance Data regarding AKJ Enterprises, Inc. from records of the Federal Motor Carrier Safety Administration
11. FMCSA Insurance Data regarding Bolar Trucking Express, Inc. from records of the Federal Motor Carrier Safety Administration
12. SafeStat Effectiveness Study Update, dated March 2004, from official government website of the Federal Motor Carrier Safety Administration
13. Motor Carrier Industry Profile: Linkages Between Financial and Safety Performance Among Major Segments, dated May 2000, originally published on the official government website of the Federal Motor Carrier Safety Administration
14. Report of the Federal Motor Carrier Safety Administration concerning May 2003 compliance review of AKJ Enterprises, Inc.
15. Report of the Federal Motor Carrier Safety Administration concerning July 2003 compliance review of AKJ Enterprises, Inc.
16. "Load Problem Data" Excel spreadsheets produced by Defendant C. H. Robinson to show data from its proprietary "Express System," kept in its usual course of business
17. "Driver Log Data" Excel spreadsheets produced by Defendant C. H. Robinson to show data from its proprietary "Express System," kept in its usual course of business
18. TransportFolio publication, Volume 15, No. 3, published by Defendant C. H. Robinson
19. Defendant's chart/spreadsheet reviewing SafeStat results for sampling of its carriers for year 2004
20. "Motor Carrier Safety Fact Sheet" from official government website of the Federal Motor Carrier Safety Administration
21. Student records of Kristina Mae Arciszewski from driving school of C. R. England, Inc. in Salt Lake City, Utah (may offer)
22. Driver's reports for Kristina Mae Arciszewski (UT, NE, MO, FL, NC) (may offer)

23. Driver's report for Charles Kevin Morris (GA) (may offer)
24. "Temporary Removal of Accident SEA and Overall SafeStat Score" from the official government website of the Federal Motor Carrier Safety Administration
25. Crash report for accident occurring March 14, 2001, from records of the Federal Motor Carrier Safety Administration concerning Bolar Trucking Express, Inc.
26. T-Chek spreadsheet data produced by Defendant, C. H. Robinson
27. Curriculum Vitae of Dr. Thomas M. Corsi, Ph.D.
28. Defendant's pleadings
29. Defendant's discovery responses

Plaintiff reserves the right to present additional exhibits: (1) depending on the outcome of the parties' respective motions *in limine*; (2) subject to Plaintiff's objections to Defendant's disclosures; (3) subject to the Court's ruling on Defendant's pending Motion to Reconsider; and (4) subject to Plaintiff's Motion to Compel.

Respectfully submitted,

WINFORD DALLAS JONES

s/ Gary C. Hancock
Of Counsel

Gary C. Hancock, VSB #16704
Timothy E. Kirtner, VSB #36938
Ann L. Bishop, VSB #43847

GILMER, SADLER, INGRAM, SUTHERLAND & HUTTON
P. O. Box 878, 65 East Main Street
Pulaski, VA 24301
540/980-1360 (telephone)
540/980-5264 (facsimile)

Byron R. Shankman, VSB #13485
P. O. Box 1859
Dublin, VA 24084

Counsel for Plaintiff, Winford Dallas Jones

CERTIFICATE OF SERVICE

I do hereby certify that I have this 21st day of April 2008 electronically filed the foregoing Disclosure of Witnesses and Exhibits with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Paul C. Kuhnel, Esquire, Wooten Hart PLC, P.O. Box 12247, Roanoke, Virginia 24024-2247, Counsel for C.H. Robinson Worldwide, Inc.; C. H. Robinson Company; C. H. Robinson Company Inc.; C. H. Robinson Company LP; C. H. Robinson International, Inc.; C. H. Robinson Operating Company LP; and C. H. Robinson Transportation Company Inc.

s/ Gary C. Hancock
Gary C. Hancock
Gilmer, Sadler, Ingram, Sutherland & Hutton
P. O. Box 878, 65 East Main Street
Pulaski, VA 24301
540/980-1360 (telephone)
540/980-5264 (facsimile)
ghancock@gsish.com